

EXHIBIT 13

From: Richard Ziegler <rziegler@acumenadr.com>
Sent: Friday, June 18, 2021 1:02 PM
To: Paola Sanchez; Adam Schachter; Reigstad, Christian; Allan Joseph; Ungar, Michael; Landman, David; ryan.roycer@ropesgray.com; Gill, Jonathan; Lenisse Cabrera; jhernandez@careyrodriguez.com; Poldneff, Katherine; David Levine; Weiner, Gregg; Djordjevic, Greg; service@careyrodriguez.com; Natalie Bedoya McGinn; Freddy Funes; Yanika Nunez; JRodriguez@careyrodriguez.com; rbriz@mayora-mayora.com; dkirby@illuminationtechnologies.com; Ward, Daniel V.
Cc: ICDR Ana Lombardia; Peralta, Nora M.; Hodgson, Mélida N.; ICDR Luis Martinez, Esq.
Subject: Final Slate for Strike/Rank Process -- Telecom Business Solution et al v Terra Towers Corp. et al, ICDR 01-21-0000-4309

Dear Counsel,

On behalf of Ms. Hodgson and myself, please be advised that the five candidates identified below have expressed willingness to serve as the chair of the Tribunal in this matter and do not appear to have any disqualifying conflicts or disclosures. It is therefore timely for the Parties to apply the strike/rank process to this slate, under which each side is free to strike up to two of the five candidates and rank order their preference of the remaining candidates (with 1 being the strongest preference). The rank orders should be supplied solely to the two co-arbitrators without copying counsel for the adverse Parties.

Please report your respective rankings to the two of us by close of business on Monday, June 21.

If either side wishes to speak with the arbitrator selected by that side, they are free to arrange such a discussion before the strike/rank deadline. As we have previously noted, however, the co-arbitrators are constrained in what they can say about the candidates and have agreed to limit any remarks to those they have already shared with each other.

The five candidates, in alphabetical order, are:

Stephanie Cohen
Marc Goldstein
Grant Hanessian
Philip Lacovara
Mark Morril

Sincerely,

Richard F. Ziegler, and for Mélida Hodgson

Richard F. Ziegler
AcumenADR LLC
41 Madison Avenue, 25th Floor
New York, New York 10010
rziegler@acumenadr.com

347-686-8385

 AcumenADR

www.acumenadr.com